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7 Attorneys for Defendant  
8 MALAMETENIA MAVROMATIS

9  
10 IN THE UNITED STATES DISTRICT COURT  
11  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13  
14 SAN FRANCISCO DIVISION  
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12 UNITED STATES,	) Case No.: CR-21-00162-WHO
	)
13 Plaintiffs,	) <b>STIPULATION AND ORDER</b>
	) <b>PERMITTING DEFENDANT</b>
14 v.	) <b>MAVROMATIS REGARDING HER</b>
	) <b>PASSPORT AND ITS RENEWAL</b>
	)
16 BABAK BROUMAND AND	)
17 MALAMETENIA MAVROMATIS,	)
	)
18 Defendants.	)
	)

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20 **I. INTRODUCTION**

21 Defendant MAVROMATIS wishes to renew her expired passport, which is in the custody  
22 of this Court's Pre-Trial Services. MAROMATIS requires her passport to be released to her so  
23 she may apply for a new U.S. Passport.

24 Therefore, the Parties, through their respective counsel, stipulate to the following  
25 agreement permitting MAVROMATIS to renew her passport.

26 The US Attorney's Office and Pre-Trial Services have represented to MAVROMATIS's  
27 counsel that neither have an objection to the following Stipulation.  
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## II. STIPULATION

### The Parties Stipulate:

1. Pre-Trial Services shall release MAVROMATIS's passport to MAVROMATIS to allow her to apply for a new passport;

2. MAVROMATIS shall surrender her newly issued U.S. Passport to Pre-Trial Services within forty-eight (48) hours of MAVROMATIS's receipt of said newly issued passport.

**SO STIPULATED:**

**Dated: March 28, 2025**

/s/ Juan M. Rodriguez  
MICHAEL J. MORSE  
JUAN M. RODRIGUEZ  
Special Assistant United States Attorney

**Dated: March 28, 2025**

/s/ Paul H. Nathan  
PAUL H. NATHAN  
Attorney for Defendant  
MALAMENTENIA MAVROMATIS

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**ORDER**

Based upon the facts set forth in this stipulation of the parties and good cause shown, the Court hereby GRANTS the above stipulation.

1. Pre-Trial Services shall release MAVROMATIS's passport to MAVROMATIS to allow her to apply for a new passport;

2. MAVROMATIS shall surrender her newly issued U.S. Passport to Pre-Trial Services within forty-eight (48) hours of MAVROMATIS's receipt of said newly issued passport.

IT SO ORDERED

DATED: April 1, 2025

  
HONORABLE WILLIAM H. ORRICK  
United States District Court